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REMARKS

Reconsideration of this application, as amended, is respectfully requested.

RE: THE ALLOWABLE SUBJECT MATTER

The Examiner's indication of the allowability of the subject matter of claim 12 is respectfully acknowledged. Claim 12, however, has not been rewritten in independent form at this time since, as set forth in detail hereinbelow, it is respectfully submitted that its parent claim 6, as amended, now also recites allowable subject matter.

RE: THE TITLE

The title has been amended to more clearly indicate the nature of the invention to which the claims are directed, as required by the Examiner.

RE: THE SPECIFICATION and DRAWINGS

The specification has been amended to correct some minor informalities of which the undersigned has become aware, including the informalities pointed out by the Examiner.

No new matter has been added, and it is respectfully requested that the amendments to the specification be approved

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and entered, and that the objection to the specification and drawings be withdrawn.

RE: THE CLAIMS

Claims 1, 6 and 13 have been amended to clarify the feature of the present invention whereby data of the position and the angle of the camera with respect to the object are transmitted to a computer for operating together the real object image of the object taken with the camera and the another image based on the position and the angle of the camera with respect to the object, as supported by the disclosure in the specification at page 12, lines 15-23.

In addition, claims 1, 4-7 and 9-13 have been amended to make some minor grammatical improvements and to correct some minor antecedent basis problems so as to put the claims in better form for issuance in a U.S. patent.

No new matter has been added, and it is respectfully requested that the amendments to the claims be approved and entered.

RE: THE PRIOR ART REJECTION

Claims 1-11 and 13 were rejected under 35 USC 102 as being anticipated by USP 5,153,833 ("Gordon et al"). This rejection,

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however, is respectfully traversed with respect to the claims as amended hereinabove.

As recognized by the Examiner, Gordon et al is directed to a mechanism for automatically transporting a dolly apparatus for a camera from one target 20 to another target 20. In Gordon et al, the dolly contains a microcomputer for judging its progress towards a second target from a first target, and optosensors for confirming that it has reached the second target.

According to the present invention as recited in amended independent claims 1, 6 and 13, however, a method (or system) is provided in which an image of an object is picked-up with a camera mounted via a pan head on a moving pedestal, and a real object image of the object taken with the camera and another image are operated together. Thus, the position and the angle of the camera with respect to the object are determined and transmitted to a computer for operating together the real object image of the object taken with the camera and the another image based on the position and the angle of the camera with respect to the object.

That is, according to the claimed present invention, the position and angle of the camera with respect to the object are determined with great accuracy so that the image of the object and another image (i.e. a computer-generated image) may be operated together in relationship to each other.

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By contrast, it is respectfully submitted that Gordon et al does not at all disclose, teach or suggest operating a real object image and another image together in relationship to each other based on the position and angle fo the camera.

With respect to claims 2 and 8, moreover, the Examiner asserts on pages 4 and 7 of the Office Action that "determining motor movement encoding motor rotations directly corresponds to measuring the length of a portion of the wheel."

It is respectfully submitted, however, that as explained on page 13 of the specification, the wheels of the moving pedestal are usually rubber. Therefore, the diameter of the wheel at the contact portion of the wheel is variable. Thus, estimates of traveling distance based on pulses from encoder are often inaccurate. And therefore, according to the present invention as recited in claims 2 and 8, the length of a portion of a wheel of the moving pedestal which has been brought into contact with the floor surface is measured, by for example rollers that rotate together with the wheels. And as explained on page 13 of the specification, measuring the length of the portion of the wheel in contact with the floor is more accurate than estimating distances based on encoder pulses.

It is respectfully submitted, therefore, that Gordon et al does not at all disclose, teach or suggest the features of the present invention recited in claims 2 and 8.

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With respect to claims 4 and 11, moreover, the Examiner points out that any two wheels of three equidistant wheels will always be equidistant.

However, according to the present invention as recited in claims 4 and 11, the two selected wheels are most distant along the moving direction of the wheels of the moving pedestal. That is, if three wheels at vertices of an equilateral triangle are moving in a direction parallel to one side of the equilateral triangle, then a distance along the moving direction between the two wheels the two wheels on the one side of the triangle is greater than a distance between either one of the two wheels on the one side of the triangle and the third wheel. Thus, according to claims 4 and 11, the selected two wheels are the two wheels that are most distant along the moving direction.

And it is respectfully submitted, therefore, that Gordon et al also does not disclose, teach or suggest the features of the present invention recited in claims 4 and 11.

In view of the foregoing, it is respectfully submitted that each of amended independent claims 1, 6 and 13, as well as claims 2-5 and 7-12 respectively depending from claims 1 and 6, all clearly patentably distinguishes over Gordon et al, under 35 USC 102 as well as under 35 USC 103.

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Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned at the telephone number given below for prompt action.

Respectfully submitted,

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